From: jay bowerman [mailto:jbowerman@bendbroadband.com]
Sent: Friday, January 23, 2015 8:07 AM
To: FS-comments-pacificnorthwest-fremont-winema
Subject: DEIS Fremont-Winema "Antelope Grazing Allotments Project"

United States Department of Agriculture Antelope Grazing Allotments Project: Draft Environmental Impact Statement

I would like to go on record stating my opinion that the Draft EIS lacks scientific validity or evidence that adequate protections for Oregon Spotted Frogs (OSF) have been considered or included in the management options.

1. There is ample evidence on the ground that Jack Creek OSF habitat has been materially and substantially degraded by livestock use.

2. Over the past 15 years, there has been a steady decline in habitat suitability and concurrent collapse of the OSF population.

3. The Fremont-Winema FS has a record of ignoring science and managing public lands in this area with lack of commitment to protecting and enhancing habitat.

4. The DEIS comments related to utilizing grazing as a management strategy for habitat enhancement can only be explained by relying upon some limited field observations and weak scientific conclusions related to observations of OSF utilizing open water in grazed areas. However, Jack Creek lacks the substrate and hydrology that would make such management using livestock feasible even if there were stronger evidence that the strategy sometimes works. Decades of grazing has made a significant contribution to disturbance, erosion, and de-watering of essential wetlands. This has been magnified by multiple years of drought, changes in the snowpack and final collapse of beaver dam structures. Grazing has removed system resilience and pushed the system and the frog population toward that threshold of no return.

5. The efforts to construct new ponds in the past year were inadequate and did not follow design specifications or the recommendatios of people with experience in creating successful OSF habitat. The small size and lack of depth in the ponds could actually create a fatal trap by attracting spawning pairs in the spring when water levels are highest followed by either drying completely prior to metamorphosis or reaching lethal temperatures during hot weather due to the shallow depth and solar exposure. Either scenario could completely wipe out the local remnant population.

6. Failure to take immediate action to protect and enhance habitat along Jack Creek risks imminent extinction of this now small but important remnant population. Such extinction would be directly attributable to the lack of action by the public land managers responsible for this site.

Unless and until a suitably healthy population of OSF on Jack Creek has been re-established through protection of existing remnant habitat and interventions to create/restore suitable pond and marsh habitat required by OSF, grazing should not be allowed on these public lands.

Jay Bowerman